

EXHIBIT B

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -

5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :
8 -----

9 : CASE NO.
10 THIS DOCUMENT : 1:17-MD-2804
11 RELATES TO ALL CASES:
12 : Hon. Dan A.
13 : Polster
14 : - - -

15 Wednesday February 20, 2019
16 - - -

17 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
18 CONFIDENTIALITY REVIEW
19 - - -

20 Videotaped deposition of PAUL
21 ANDREW PYFER, taken pursuant to notice,
22 was held at Golkow Litigation Services,
23 One Liberty Place, 1650 Market Street,
24 Suite 5150, Philadelphia, Pennsylvania
25 19103, beginning at 9:35 a.m., on the
26 above date, before Amanda Dee
27 Maslynsky-Miller, a Certified Realtime
28 Reporter.
29 - - -

30 GOLKOW LITIGATION SERVICES
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32 deps@golkow.com
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ALSO PRESENT:

12 Devyn Mulholland, Videographer
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(It is hereby stipulated and agreed by and among counsel that sealing, filing and certification are waived; and that all objections, except as to the form of the question, will be reserved until the time of trial.)

VIDEO TECHNICIAN: We are now on the record. My name is Devyn Mulholland, I'm a videographer for Golkow Litigation Services. Today's date is February 20, 2019. The time is 9:35 a.m.

This video deposition is being held in Philadelphia, Pennsylvania, in the matter of National Prescription Opiate Litigation. The deponent is Andrew Pyfer.

Counsel will be noted on the stenographic record. The court

1 reporter is Amanda Miller and will
2 now swear in the witness.

3 - - -

4 PAUL ANDREW PYFER, after
5 having been duly sworn, was
6 examined and testified as follows:

7 - - -

8 EXAMINATION

9 - - -

10 BY MR. MADDEN:

11 Q. Please state your name, sir.

12 A. Paul Andrew Pyfer.

13 Q. Mr. Pyfer, I'm Brian Madden.

14 I represent the plaintiffs in this
15 litigation.

16 Can you tell us in what city
17 or town you reside?

18 A. I live in Wayne,
19 Pennsylvania.

20 Q. Wayne is where in relation
21 to Philadelphia?

22 A. Fifteen miles west --
23 northwest.

24 Q. You have given a deposition

1 mystery to it, a lot of times juries get
2 bored and frustrated when they have to
3 sit around watching videotapes.

4 We, the plaintiffs, don't
5 have the ability to compel you to come to
6 Ohio by subpoena. And so I'm just trying
7 to get clear on the record whether, if
8 you're not there in person, it's because
9 you refused to come, or what? Are you
10 willing to testify if asked?

11 MR. ANDRISANI: Again,
12 objection.

13 THE WITNESS: Can we deal
14 with that if this goes to court?
15 I have no -- I mean, if it goes to
16 court and I'm asked, I'll make a
17 decision then.

18 I mean, I'm not running.
19 And I'm here to tell you the truth
20 and what I believe.

21 BY MR. KIEFFER:

22 Q. Okay. Fair enough.

23 Just so we're clear, I can
24 tell you, from the standpoint of the